## **EXHIBIT B Affidavit of Zack Ennis**

## IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA SOUTHERN DIVISION

C.W. JACKSON, #158384,	)
Plaintiff,	) }
<b>v.</b>	) CIVIL ACTION NO.: 1:06-CV-174-WKW
COFFEE COUNTY JAIL, et al.,	)
Defendants.	)
AFFIDAVIT OF ZACK ENNIS	
STATE OF ALABAMA	)
COUNTY OF COFFEE	) )

- 1. My name is Zack Ennis. I am over the age of nineteen and am competent to execute this affidavit, which is based on my personal knowledge, training and experience.
- 2. I am, and at all times relevant to Plaintiff's Complaint I was, the Jail Administrator of the Coffee County Jail in Coffee County, Alabama.
- 3. I have reviewed the Plaintiff's Complaint filed in this matter. I have very limited personal knowledge of any of the facts stated in the Complaint.
- 4. Over the past several years I have personally inspected the Coffee County Jail for spiders and those inspections have failed to uncover spiders of any type inside the jail. Further, I have never had a jail staff member report that he or she had seen a spider inside the jail. The Coffee County Jail contracts with an extermination company to spray the jail interior for spiders and other vermin on a monthly basis.
- 5. It is the policy of the Coffee County Sheriff's Department that the Jail personnel provide inmates access to timely medical treatment. Inmate medical requests may be made

orally to any member of the jail staff. Members of the jail staff are charged with responding to such requests, and a complaining inmate is seen by a doctor at the earliest possible opportunity. In an emergency situation the jail personnel have the authority to summon emergency medical personnel and transport an inmate to the Enterprise Medical Center immediately.

- It is a violation of the policies of the Coffee County Jail to deny necessary 6. medical attention, care or medication to an inmate.
- Neither I nor any member of the Coffee County Jail staff are health care 7. professionals, nor have we received any substantial medical training. I rely on trained medical personnel, particularly doctors, to instruct the as to the appropriate treatment of inmate medical problems, and I follow the instructions of said health care professionals diligently.
- After being seen and treated by Doctor Henry Cochran for a possible spider bite, 8. the Plaintiff asked me if he could be seen by another doctor. However, I was informed that Dr. Cochran had examined the Plaintiff and determined that the Plaintiff did not need to be referred to another physician; therefore, relying on Dr. Cochran's expertise, I denied the Plaintiff's request.
- I certify and state that the documents provided to the Court which are attached to 9. the Defendants' Special Report are true and correct copies of the Plaintiff's inmate and health records, kept at the Coffee County Jail in the regular course of business.
- I affirm, to the best of my present knowledge and information, that the above 10. statements are true, that I am competent to make this affidavit, and that the above statements were made by drawing from my personal knowledge of the situation.

SWORN TO and SUBSCRIBED before me this 12 th day of April, 2006.

My Commission Expires: 2-15-0

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